

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OCT - 8 2020

1. SAVANNA ROBINSON,)
v. Plaintiff,) Case No. CJ-20-
v.)
1. STATE OF OKLAHOMA, ex rel.,) JURY TRIAL DEMANDED
Oklahoma Dept. of Human Services,) ATTORNEY LIEN CLAIMED
Defendant.)

RICK WARREN
COURT CLERK
111

CJ-2020-4794

PETITION

COMES NOW THE PLAINTIFF, Savanna Robinson, and pleads her claims as follows:

PARTIES

1. The Plaintiff is Savanna Robinson, an adult female resident of Sebastian County, Arkansas.
2. The Defendant is the State of Oklahoma, ex rel., Oklahoma Department of Human Services.

VENUE

3. Plaintiff's claims are for gender discrimination, including creation of a sexually hostile working environment and retaliation after Plaintiff complained of sexual harassment, in violation of Title VII of the Civil Rights Act of 1964.
4. The Defendant is the State of Oklahoma such that venue is proper in Oklahoma County, Oklahoma.

STATEMENT OF FACTS

5. The Defendant employed at least fifteen employees for at least twenty weeks of the current or proceeding year such that it is an employer subject to Title VII.
6. Plaintiff, Savanna Robinson, was employed by the Defendant from around February 19, 2019 until around May 15, 2019.
7. Plaintiff worked under the job title of Child Welfare Specialist II.

EXHIBIT 4

8. During all periods of her employment Plaintiff was qualified for her job and performed satisfactorily.
9. Beginning around April 3, 2019 Plaintiff's co-worker, Daniel Anele (male), began sexually harassing the Plaintiff including:
 - A. Mr. Anele would push Plaintiff's head toward his crotch and tell Plaintiff that he (Anele) would give Plaintiff "the best head of your life", insinuating that Mr. Anele would do this in exchange for Plaintiff performing oral sex on Mr. Anele.
 - B. When Plaintiff attempted to walk away from Mr. Anele making sexually inappropriate comments, Mr. Anele would grab her arm and say things such as, "come on, I'm not gonna rape you".
 - C. Mr. Anele would grab at Plaintiff's chest, including grabbing her by the front of her shirt and bra.
10. Mr. Anele's conduct described in para. 9, above, was objectively offensive and offensive to the Plaintiff such that it created a sexually hostile working environment.
11. Plaintiff reported Mr. Anele's sexual harassment to Defendant including to her supervisor, Jennifer Sainer.
12. Defendant told Mr. Anele of Plaintiff's report.
13. Thereafter Mr. Anele began retaliating against Plaintiff including by yelling at the Plaintiff and attempting to intimidate her.
14. Plaintiff reported Mr. Anele's retaliation to Defendant, including to Ms. Sainer.
15. Defendant terminated the Plaintiff's employment around May 15, 2019.
16. Plaintiff asked for the reason she was being terminated. She was told that because she was in her probationary period the Defendant did not have to give her a reason. Defendant refused to provide Plaintiff with the reason for her termination.

17. After the Plaintiff was terminated her job position and job duties continued to exist.
18. Mr. Anele was not terminated.
19. As a direct result of the Defendant's conduct the Plaintiff has suffered, and continues to suffer, wage loss (including back, present and front pay along with the value of benefits associated with such wages) and emotional distress/dignitary harm damages including worry, frustration, sadness and similar unpleasant emotions.
20. At the least, motivating factors in the decision to sexually harass and retaliate against the Plaintiff include her gender and but-for reasons for retaliating against Plaintiff include her gender and/or reports of sexual harassment.
21. Plaintiff has exhausted her administrative remedies by timely filing an EEOC charge of discrimination on November 19, 2019. Plaintiff was issued a notice of her right to sue on September 1, 2020 and Plaintiff received such notice thereafter. This complaint is timely filed within ninety (90) days of Plaintiff's receipt of her notice of right to sue.

COUNT I

Plaintiff incorporates the above paragraphs and further alleges:

22. Gender discrimination including creation of a sexually hostile working environment and retaliation after Plaintiff complained of sexual harassment violates Title VII of the Civil Rights Act.
23. Under this Count the Plaintiff is entitled to her wage loss (including back, present and front pay along with the value of benefits associated with such wages) and emotional distress/dignitary harm damages.
24. Plaintiff is also entitled to an award of punitive damages.

PRAYER

WHEREFORE, Plaintiff requests this Court enter judgment in her favor and against the Defendants, and grant her all compensatory damages suffered, together with all damages, liquidated damages, attorneys' fees, costs and interest, and such other legal and equitable relief as this Court deems just and proper in an amount greater than that required for diversity jurisdiction.

RESPECTFULLY SUBMITTED THIS 8th DAY OF OCTOBER 2020.

HAMMONS, HURST & ASSOCIATES


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